

APPLICANT(S): BURR, Jeremy  
SERIAL NO.: 10/035,463  
FILED: October 18, 2001  
Page 2

### REMARKS

The present response is intended to be fully responsive to all points of objection and/or rejection raised by the Examiner and is believed to place the application in condition for allowance. Favorable reconsideration and allowance of the application is respectfully requested.

Applicants assert that the present invention is new, non-obvious and useful. Prompt consideration and allowance of the claims is respectfully requested.

### Status of Claims

Claims 1-5 and 7-28 are pending in the application.

Claims 1-5 and 7-28 have been rejected.

### CLAIM REJECTIONS

#### 35 U.S.C. § 103 Rejections

In the Office Action, the Examiner rejected claims 1-5 and 7-28 under 35 U.S.C. § 103(a), as being unpatentable over Ahmed et al. (US Patent No. 6,816,460) in view of Dunko et al. (US Patent Application Publication No. 20020183068 A1). In view of the remarks below, Applicants traverse the rejection and request that the rejection be withdrawn.

The Ahmed reference, entitled "Location based routing for ad hoc mobile networks" discloses:

In an ad-hoc mobile network, a geometry-based routing algorithm (GRA) is used to route traffic from a source node to a destination node. In the GRA, a source node maintains location information and routing information for all nodes in a local area and approximate location information for at least some nodes outside the local area. If the source node has to send a packet to a destination node outside their local area, then the source node uses

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APPLICANT(S): BURR, Jeremy  
SERIAL NO.: 10/035,463  
FILED: October 18, 2001  
Page 3

the approximate location information of the destination node to identify which node in its local area is closer to the destination node than the source node. The source node then sends the packet to the identified local node for further routing. (Abstract)

Thus – and as further expounded in the entire disclosure of Ahmed, which has been studied by Applicants – Ahmed discloses an “intuitive” ad-hoc network, which permits any node to effectively connect to all other nodes in its geographic vicinity.

However, as recognized by the Examiner, Ahmed does not teach or even remotely suggest constructing a routing list of at least some of the mobile devices of the ad-hoc network, which sub-set includes devices that have installed thereon common application software, as essentially recited in claims 1, 7, and 18.

The Examiner, therefore, attempts to find this missing element by combining the teaching of Ahmed with Dunko. However, Dunko does not cure these deficiencies.

The Dunko reference, entitled “Searching method for mobile terminal” discloses:

A mobile terminal searches for known individuals and acquaintances who may be in the vicinity of the user. A database of individual names and associated search codes is stored in the mobile terminal. Individual names may also be associated with a group. The user selects one or more individuals from the database that the user desires to find. The mobile terminal searches for other compatible devices and exchanges search codes with any found devices. If the search code received from a found device matches a search code for a selected individual or group, the user is notified. The identity of the found party may also be provided to the user as part of the notification.

Thus, Dunko identifies a devices in a vicinity by their identification number, and correlates them to a group defined by a user (e.g., Skateboard Buddies). However, Dunko merely describes simply establishing communication with compatible devices, and categorizing based on group identification. (see, e.g., Dunko p. 4 para. 36). The Dunko

APPLICANT(S): BURR, Jeremy  
SERIAL NO.: 10/035,463  
FILED: October 18, 2001  
Page 4

reference, therefore, does not disclose or suggest constructing a routing list of at least some of the mobile devices of the ad-hoc network, which sub-set includes devices that have installed thereon common application software, as essentially recited in claims 1, 7 and 18. Dunko merely describes searching for "compatible devices" for basic communication.

For example, the Bluetooth embodiment described by Dunko is no more than a communication protocol, not application software. Therefore, Dunko discloses that the only information exchanged are codes used for searching and identification. These are clearly insufficient to establish an ad hoc network of devices having thereon a common application software, as essentially recited in the claims.

Therefore, even if one were to combine the teachings of Ahmed and Dunko, the pending claims would not be taught, because there would still be no teaching of constructing a routing list of at least some of the mobile devices of the ad-hoc network, which sub-set includes devices that have installed thereon common application software, as essentially recited in claims 1, 7 and 18.

Based on the above, Applicant respectfully asserts that claims 1, 7 and 18 are allowable over the art of record, as are claims 2-5, 8-17 and 19-28, which respectively depend therefrom. Withdrawal of the rejection is respectfully requested.

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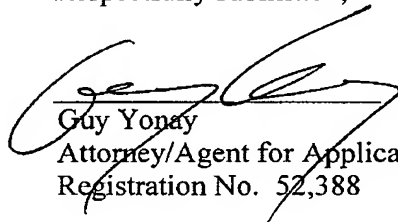
APPLICANT(S): BURR, Jeremy  
SERIAL NO.: 10/035,463  
FILED: October 18, 2001  
Page 5

In view of the foregoing amendments and remarks, the pending claims are deemed to be allowable. Their favorable reconsideration and allowance is respectfully requested.

Should the Examiner have any question or comment as to the form, content or entry of this Amendment, the Examiner is requested to contact the undersigned at the telephone number below. Similarly, if there are any further issues yet to be resolved to advance the prosecution of this application to issue, the Examiner is requested to telephone the undersigned counsel.

Please charge any fees associated with this paper to deposit account No. 50-3355.

Respectfully submitted,

  
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Dated: November 6, 2006

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